



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



313773

October 18, 2006

Mr. Jerry C. Winslow  
Principal Environmental Engineer  
Xcel Energy  
414 Nicollet Mall (Ren. Sq. 8)  
Minneapolis, Minnesota 55401

REPLY TO THE ATTENTION OF:

SR-6J

RE: Response to RI/FS Schedule Modification Request  
Ashland/NSP Lakefront Superfund Site

Dear Mr. Winslow:

The United States Environmental Protection Agency (EPA) has reviewed the letter requesting a Remedial Investigation/Feasibility Study (RI/FS) schedule modification submitted by Northern States Power (d.b.a. Xcel Energy) on September 12, 2006 for the Ashland/Northern States Power Lakefront Superfund Site. Our comments are provided below:

1. Need for time to respond to and resolve technical comments.

The meeting that was held on October 12, 2006, hopefully helped us resolve most of the technical issues. EPA thought it was important to talk before submitting the response to EPA's comments. It is likely that an additional round of review, comment and revision will be required to resolve any outstanding technical issues. It was agreed that after the October 12<sup>th</sup> meeting NSPW would submit their written response to EPA's comments by October 27<sup>th</sup>.

2. Need for "treatability studies".

NSPW submitted the Candidate Technologies and Testing Needs Technical Memorandum on September 22, 2006, for EPA review. EPA has reviewed the technical memorandum and our comments are provided below.

- 1) It appears that this technical memorandum has been submitted out of sequence and is not in accordance with the order of reports as required in the EPA approved Work Plan. The Alternatives Screening Technical Memorandum has not been submitted as per the schedule in the Work Plan. In addition, the SOW states that the Alternatives Screening Technical Memorandum shall be submitted within 30 days after receipt of EPA's comments on the Remedial Action Objectives Technical Memorandum. The Work Plan infers that in the Alternatives Screening Technical Memorandum the candidate technologies will be identified. The Work Plan also states that EPA will use information presented in the Candidate Technologies and Testing Needs Technical Memorandum to determine if treatability testing is needed. Further, this Candidate Technologies and Testing Needs Technical Memorandum does not present a list of candidate technologies as required in the SOW. There is no

rationale provided as to why the Work Plan required technical memorandums could not be completed without conducting the treatability tests listed in this technical memorandum, only assertions that they are required to complete the Alternatives Screening Technical Memorandum. At this point no attempt has been made to demonstrate any technologies or evaluate any technologies, nor has a case been made that they cannot be sufficiently demonstrated or adequately evaluated on the basis of available information. To the contrary, practical candidate technologies are known to be demonstrable and sufficient information exists to complete the Feasibility Study without performing all the tests presented here which address different and mutually exclusive technologies. Many of the tests may be required to be performed during the pre-design phase depending upon the selected remedy in the Record of Decision.

- 2) Many of the bench scale or treatability studies are specifically directed at the use of capping as an alternative, yet many of the basic questions of this site's suitability for application of this technology have not been adequately addressed to date. The basic stability of the site sediments is in question. This is a shoreline area experiencing constant wave action, and in the winter, ice build-up and gouging. There are significant layers of wood chips and sawdust which vary in bulk density and strength. Underlying and within the affected sediments/wood chips are significant amounts of free product.
- 3) **2.1 Cap Flux Testing:** This test seems to be more of a cap design bench scale test to determine design requirements for a cap. If dredging is selected as the remedy, then cap flux testing would be superfluous. If capping was indicated as the preferred technology then this would be most appropriately carried out in the pre-design phase. Again, establishing site remedial goals and basic screening of alternatives needs to be accomplished prior to undertaking extensive, long term bench scale studies.
- 4) **2.2 Bench Air Emissions Testing:** Air emissions in the context of dredging can be controlled by using the proper equipment and thus is more of a design issue than a screening of technologies issue. Estimates of potential emissions can be made based upon concentrations of VOCs in previously acquired sediment samples and the proposed technology. Much depends upon the design of the dredge spoils treatment train and how the alternative is implemented. Worker exposure and atmospheric emissions can be controlled by use of properly designed engineering controls and appropriate PPE. Thus, this is more of a design issue than an alternatives selection issue. If capping were the alternative that was selected, then there is no point in conducting a bench test for air emissions, it would be a wasted effort. Alternatives should be screened first prior to conducting a wide array of bench scale tests.

Based on the comments above, EPA has determined that "treatability studies" are not necessary at this site.

EPA agrees that the SITE demonstration is a critical path item for the completion of the FS. Based on the most recent discussions, the SITE demonstration project is expected to begin around November 6, 2006. Therefore, based on the draft Work Plan submitted on August 8, 2006, the schedule is approximately one month behind. So, if everything goes as planned and the SITE demonstration starts in early November 2006, the Site Technology Capsule should be available on or about May 6, 2007. According to the draft Work Plan, the SITE demo will be performed concurrently with the FS activities and the information from the demonstration will be incorporated in the final FS documents.

The recommended RI/FS schedule proposed by EPA:

- 1) Submission of responses to RI reports by October 27, 2006.
- 2) Submission of Alternatives Screening Technical Memorandum 30 calendar days after receipt of EPA's comments to RAO Technical Memorandum. For the purposes of this recommendation it is assumed that the Alternatives Screening Tech. Memo. will be submitted on October 27, 2006.
- 3) Submission of Comparative Analysis of Alternatives Memorandum 30 days after receipt of EPA's comments to Alternatives Screening Tech. Memo. The deliverable will be due by December 18, 2006.
- 4) Submission of Draft FS report 45 days after receipt of EPA's comments to Comparative Analysis of Alternatives Memo. The deliverable will be due by March 2, 2007.
- 5) The SITE demo information should be available by the time we finalize the FS documents.

NSPW should make every effort to maintain this schedule but EPA understands that events beyond your control may result in requests for further modifications to the schedule.

If you have any questions or would like to discuss things further, please contact me at (312) 886-1999.

Sincerely,



Scott K. Hansen  
Remedial Project Manager

cc: Dave Trainor, Newfields  
Jamie Dunn, WDNR  
Omprakash Patel, Weston Solutions, Inc.  
Henry Nehls-Lowe, DHFS  
Ervin Soulier, Bad River Band of the Lake Superior Chippewa  
Melonee Montano, Red Cliffe Band of the Lake Superior Chippewa